## CINNAMON MUELLER

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September 1, 2005

Marlene H. Dortch Office of the Secretary Federal Communications Commission 445 12<sup>th</sup> Street SW Washington, DC 20554

Re: Armstrong Digital Services, Inc. ("Armstrong Telephone")
Subscriber Acknowledgement Report, September 1, 2005

WC Docket No. 05-196

Dear Ms. Dortch:

We write on behalf of Armstrong Telephone. This Report updates Armstrong Telephone's compliance with the customer notification requirements of 47 CFR § 9.5. First, we summarize Armstrong Telephone's customer notification efforts.

**Armstrong Telephone's notification efforts.** At the time that Armstrong Telephone installs each customer's VoIP services, it supplies a written advisory that warns of the circumstances under which its E911 services may not be available, or may be limited in comparison to traditional E911 service.

Generally, the authorized customer is at home at the time of installation, and Armstrong requires that customer to read and affirmatively acknowledge, by initialing the advisory form, that they have understood the advisory. Occasionally, however, the authorized customer has left another adult in the home to be present during the installation (Armstrong Telephone will only install its VoIP services if a person over 18 years of age is at the subscriber's home). In those cases, Armstrong Telephone leaves the acknowledgement form with that adult, and explains that the authorized customer must read, sign, and return the acknowledgment to Armstrong Telephone. As described below, Armstrong Telephone will be following up with any customers from whom it has not received an affirmative acknowledgement.

Percentage of subscribers to whom Armstrong Telephone has delivered notices and warning stickers. Armstrong Telephone has notified all of its VoIP customers in writing of the limitations on its E911 services.

Armstrong has not yet provided its subscribers with warning stickers because those stickers are still being printed. Armstrong expects to receive and begin distribution of the stickers by September 15, 2005.

Percent of subscribers from whom Armstrong Telephone has obtained affirmative acknowledgements. Armstrong Telephone has received affirmative acknowledgements from substantially all of its VoIP customers. Armstrong Telephone has been provisioning VoIP services to hundreds of new customers each week. Accordingly, there is sometimes a short time lag between provisioning and receiving an affirmative acknowledgement from the small percentage of authorized customers who are not at home at the time of installation. Consistent with past performance and Armstrong's compliance with the FCC's regulations, Armstrong expects to receive affirmative acknowledgements from substantially all of its customers by September 22, 2005, and on a going-forward basis.

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Armstrong Telephone's planned actions toward customers who do not affirmatively acknowledge having received and understood the advisory. In the next couple of weeks, Armstrong Telephone will mail another subscriber agreement and acknowledgment form to any customers from whom it has not received an affirmative acknowledgement. The mailing will include a stamped return envelope for the form. Armstrong Telephone will then individually call any customers from whom it has not received affirmative acknowledgements, and will attempt to obtain acknowledgments by explaining the acknowledgement requirement to the customers.

**Soft or warm disconnect.** Armstrong Telephone has just recently begun to provision VoIP services and is technically cable of doing a soft or warm disconnect, but has not yet had the need to do so.

If you have any further questions, please contact me.

Regards,

Nicole Paolini-Subramanya Attorney for Armstrong Telephone